

FEDERAL COMMUNICATIONS COMMISSION  
FEE PROCESSING FORM

FOR  
FCC  
USE  
ONLY

FCC/MELLON JAN 28 1994

Please read instructions on back of this form before completing it. Section I MUST  
concurrent actions which require you to list more than one Fee Type Code, you must  
must accompany all payments. Only one Fee Processing Form may be submitted per  
legibly. All required blocks must be completed or application/filing will be returned without action.

01-31-94 8305699 004

BAH

SECTION I

APPLICANT NAME (Last, first, middle initial)

ComTech, Inc.

DOCKET FILE COPY ORIGINAL

PR 93-35

MAILING ADDRESS (Line 1) (Maximum 85 characters - refer to Instruction (2) on reverse of form)

185-D Commerce Circle

MAILING ADDRESS (Line 2) (if required) (Maximum 85 characters)

CITY

Sacramento

STATE OR COUNTRY (if foreign address)

CA

ZIP CODE

95815-4289

CALL SIGN

OTHER FCC IDENTIFIER

Enter in Column (A) the correct Fee Type Code for the service you are applying for. Fee Type Codes may be found in FCC  
Fee Filing Guides. Enter in Column (B) the Fee Multiple, if applicable. Enter in Column (C) the result obtained from multiplying  
the value of the Fee Type Code in Column (A) by the number entered in Column (B), if any.

(A)	(B)	(C)											
FEE TYPE CODE	FEE MULTIPLE (if required)	FEE DUE FOR FEE TYPE CODE IN COLUMN (A)	FOR FCC USE ONLY										
(1) <table><tr><td>P</td><td>D</td><td>W</td></tr></table>	P	D	W	<table><tr><td></td><td></td><td></td><td></td></tr></table>					<table><tr><td>\$</td><td>105.00</td></tr></table>	\$	105.00	<table><tr><td></td></tr></table>	
P	D	W											
\$	105.00												

SECTION II

— To be used only when you are requesting concurrent actions which result in a  
requirement to list more than one Fee Type Code.

(A)	(B)	(C)											
FEE TYPE CODE	FEE MULTIPLE (if required)	FEE DUE FOR FEE TYPE CODE IN COLUMN (A)	FOR FCC USE ONLY										
(2) <table><tr><td></td><td></td><td></td></tr></table>				<table><tr><td></td><td></td><td></td><td></td></tr></table>					<table><tr><td>\$</td><td></td></tr></table>	\$		<table><tr><td></td></tr></table>	
\$													
(3) <table><tr><td></td><td></td><td></td></tr></table>				<table><tr><td></td><td></td><td></td><td></td></tr></table>					<table><tr><td>\$</td><td></td></tr></table>	\$		<table><tr><td></td></tr></table>	
\$													
(4) <table><tr><td></td><td></td><td></td></tr></table>				<table><tr><td></td><td></td><td></td><td></td></tr></table>					<table><tr><td>\$</td><td></td></tr></table>	\$		<table><tr><td></td></tr></table>	
\$													
(5) <table><tr><td></td><td></td><td></td></tr></table>				<table><tr><td></td><td></td><td></td><td></td></tr></table>					<table><tr><td>\$</td><td></td></tr></table>	\$		<table><tr><td></td></tr></table>	
\$													
ADD ALL AMOUNTS SHOWN IN COLUMN C, LINES (1) THROUGH (5), AND ENTER THE TOTAL HERE. THIS AMOUNT SHOULD EQUAL YOUR ENCLOSED REMITTANCE. →			<table><tr><td>TOTAL AMOUNT REMITTED WITH THIS APPLICATION OR FILING</td></tr><tr><td>\$ 105.00</td></tr></table>	TOTAL AMOUNT REMITTED WITH THIS APPLICATION OR FILING	\$ 105.00	<table><tr><td>FOR FCC USE ONLY</td></tr><tr><td>105.00</td></tr></table>	FOR FCC USE ONLY	105.00					
TOTAL AMOUNT REMITTED WITH THIS APPLICATION OR FILING													
\$ 105.00													
FOR FCC USE ONLY													
105.00													

## INSTRUCTIONS FOR COMPLETING FEE PROCESSING FORM, FCC FORM 155, August 1991

- (1) **"Applicant Name"** - Enter the name (last, first, middle initial) of the applicant as it appears on the original application or filing being submitted with this Fee Processing Form. If company, enter name which is used commercially.
- (2) **"Mailing Address (Line 1)"** - Enter the street address or post office box number to which the applicant wishes correspondence sent.
- (3) **"Mailing Address (Line 2)"** - This line may be used for further identification of the address if additional space is required.
- (4) **"City"** - Enter the name of the city associated with the given street address.
- (5) **"State or Country"** - Enter the appropriate two-digit state abbreviation as prescribed by the U.S. Postal Service. If address is foreign, enter the appropriate country name here.
- (6) **"ZIP Code"** - Enter the appropriate five or nine-digit ZIP Code prescribed by the U.S. Postal Service.
- (7) **"Call Sign or Other FCC Identifier"** - Enter the applicable call or unique FCC identifier, if any, as shown on your attached application or filing. If applying for a service affecting more than one call sign, enter one call sign only.
- (8) **Column (A), "Fee Type Code"** - Enter correct Fee Type Code(s) from the appropriate Fee Filing Guide. Only one Fee Processing Form may be submitted per application or filing. Inaccurate or erroneous Fee Type Codes may result in your application or filing being returned to you without further processing.
- (9) **Column (B), "Fee Multiple"** - Certain applications and filings may request action with respect to more than one station, license, frequency, or party and can be submitted together with one check if they meet specific conditions. This column is used only if a multiple, i.e., two or more, is being applied for. Examples of when this would be used are renewing more than one call sign, frequency, station, or the transfer of control of more than one station. Refer to the appropriate Fee Filing Guide for additional information.
- (10) **Column (C), "Fee Due for Fee Type Code in Column (A)"** - Enter in this block the amount of the fee associated with the Fee Type Code shown in Column (A) (times (X) the fee multiple, if required).
- (11) **"Total Amount Remitted With This Application or Filing"** - Enter the total of lines (1) through (5) of Column (C). This amount should equal the amount of your check or money order. We will not accept multiple checks.

### HOW TO SUBMIT APPLICATIONS AND FILINGS

o Each application or filing should be assembled with the Fee Processing Form, FCC Form 155, stapled to the top of the application with the check placed on top of the Fee Processing Form. **DO NOT STAPLE THE CHECK TO THE APPLICATION OR FEE PROCESSING FORM, FCC FORM 155.** Required copies of applications should be clearly identified as "duplicate copy" and placed behind the original package. **"Stamp and receipt" copies should be placed on top of the original package and CLEARLY identified as return copies.** Extraneous material and extra copies should be avoided at all times. Failure to follow these instructions will delay the processing of your submission.

o Completed applications or filings should be mailed to the proper address shown in the Fee Filing Guide for the particular service for which you are applying or making a filing. **All applications and filings must be properly addressed to the appropriate P.O. box number,** even if hand delivered to the address listed below. Applications received before midnight on a normal business day will receive that day's date as the receipt date. Deliveries made after midnight on Fridays will not be "officially" receipted until the next Monday. Applications received on weekends and government holidays are dated the next regular business day.

o A single check, bank draft or money order made payable to the Federal Communications Commission and denominated in U.S. dollars and drawn upon a U.S. financial institution must be included with each application or filing requiring a fee. No postdated, altered or third-party checks will be accepted. Do not send cash.

o Parties hand delivering applications or filings may receive dated receipt copies by presenting copies of the applications or filings to the acceptance clerk at the time of delivery. **Receipts will be provided for mail-in applications or filings if an extra copy of the application or filing is provided along with a self-addressed stamped envelope.** Only one piece of paper per application or filing will be stamped for receipt purposes.

### REMEMBER

o A separate completed Fee Processing Form is required with each application or filing except in certain circumstances. Please refer to the appropriate Fee Filing Guide for additional information.

o A wrong Fee Type Code or incorrect remittance may result in your application or filing being returned without processing, or result in the dismissal of your application or filing. **Please ensure that FEE TYPE CODES are correct and that your check or money order equals the amount shown in the TOTAL AMOUNT REMITTED WITH THIS APPLICATION OR FILING block before submitting your application or filing.**

o If you have any questions completing this form, please call the Fees Hotline, 202/632-FEES.

### FCC NOTICE FOR INDIVIDUALS REQUIRED BY THE PRIVACY ACT AND THE PAPERWORK REDUCTION ACT

Part 1, Subpart G of the Commission's rules authorize the FCC to request the information on this form. The information requested is required in order to obtain a license or authorization from the Commission. The purpose of the information is to provide a means to link a fee payment to a specific invoice, application or filing. The information will be used by the Commission to maintain data concerning fees paid to the Commission, for internal financial control, audit, and reporting purposes. Information requested on this form will be available to the public. Your response is required to obtain a license or other authorization from the Commission.

Public reporting burden for this collection of information is estimated to average 10 minutes per response, including the time for reviewing instructions, searching data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Federal Communications Commission, Office of Managing Director, Washington, DC 20554, and to the Office of Management and Budget, Paperwork Reduction Project (3060-0440), Washington, DC 20503.

### THIS ADDRESS IS FOR HAND CARRY OR COURIER DELIVERY ONLY:

Federal Communications Commission  
c/o Mellon Bank  
Three Mellon Bank Center  
525 William Penn Way  
27th Floor, Room 153-2713  
Pittsburgh, Pennsylvania 15259-0001  
(Attention: Wholesale Lockbox Shift Supervisor)

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

In the Matter of:

REQUEST OF COMTECH, INC. )  
FOR A WAIVER OF SECTION )  
90.495(A)(5) TO ALLOW )  
COMTECH, INC. AND ITS )  
AFFILIATE, AMERICAN SATELLITE )  
PAGING, ADDITIONAL TIME TO )  
TRANSITION TO DEDICATED )  
TRANSMITTERS )

93-35

To: The Private Radio Bureau

REQUEST FOR WAIVER

Respectfully submitted,

ComTech, Inc.

By: David E. Weisman, Esquire  
Alan S. Tilles, Esquire

Its Attorneys

Meyer, Faller, Weisman and  
Rosenberg, P.C.  
4400 Jenifer Street, N.W.  
Suite 380  
Washington, D.C. 20015  
(202) 362-1100

January 27, 1994

### SUMMARY

ComTech, Inc. ("ComTech") and its affiliate, American Satellite Paging, hereby respectfully request a temporary waiver of Section 90.495(a)(5) of the Commission's Rules. The waiver seeks to grant to ComTech twenty-four months to convert certain of its existing private carrier paging ("PCP") transmitters from their current use of multi-frequency transmitters to dedicated transmitters while retaining exclusivity in accordance with the Commission's Report and Order in PR Docket No: 93-35.

In the Notice of Proposed Rulemaking, the Commission proposed that PCP licensees could earn exclusivity provided that they satisfy certain construction and coverage requirements. The NPRM did not prohibit licensees from using multifrequency transmitters to meet their construction requirements. Consistent with industry practice and with ComTech's business plan and with the perceived intent of the NPRM, ComTech continued to construct on a rapid basis its PCP system using multifrequency transmitters offering such paging service to the public in its operations.

Notwithstanding the support of the majority of commenting parties, the Commission implemented Rule Section 90.495(a)(5) which, when applied to constructed and operating systems, prohibits licensees from counting multiple frequency transmitters toward exclusivity on multiple frequencies. Therefore, even though ComTech provides PCP service to the public from over 519 current transmitters on its three (3) operating PCP frequencies, it needs to add an additional 292 dedicated transmitters in order to meet

the dedicated transmitter requirement under the recently adopted rules.

Because of the number of additional transmitters required by ComTech to meet the dedicated transmitter rule and the failure in the Commission's Report and Order to allow for a transition period or slow growth period to apply to grandfathered or incumbent licensees, ComTech will need a temporary waiver of the multifrequency transmitter rule for 24 months in which to change-out its multifrequency transmitters to dedicated transmitters.

## TABLE OF CONTENTS

I.	Introduction.....	1
II.	Waiver Sought.....	5
III.	Grant of ComTech's Waiver is Appropriate.....	6
IV.	Grant of ComTech's Waiver Will be in the Public Interest.....	10
V.	Conclusion.....	12

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

In the Matter of:

REQUEST OF COMTECH, INC.           )  
FOR A WAIVER OF SECTION           )  
90.495(A)(5) TO ALLOW            )  
COMTECH, INC. AND ITS            )  
AFFILIATE, AMERICAN SATELLITE   )  
PAGING, ADDITIONAL TIME TO       )  
TRANSITION TO DEDICATED           )  
TRANSMITTERS                       )

To: The Private Radio Bureau

REQUEST FOR WAIVER

ComTech, Inc. ("ComTech") and its affiliate, American Satellite Paging, by their attorneys and pursuant to Section 90.151 of the Commission's Rules, hereby respectfully request a temporary waiver of Section 90.495(a)(5) of the Commission's Rules. The waiver seeks to grant to ComTech twenty-four months to convert certain of its existing private carrier paging ("PCP") transmitters from their current use of multi-frequency transmitters to dedicated transmitters while retaining exclusivity in accordance with the Commission's Report and Order in PR Docket No: 93-35.<sup>1</sup> ComTech submits the following in support of its Waiver Request:

I. Introduction

1. ComTech is a telecommunications corporation consisting of two main divisions: reselling cellular services statewide in California and a local, regional and nationwide provider of private

---

<sup>1</sup> In The Matter Of Amendment of the Commission's Rules to Provide Channel Exclusivity to Qualified Private Paging Systems at 929-930 MHz - FCC 93-479 (Release November 17, 1993) (hereinafter the "Report and Order").

carrier paging service. ComTech's cellular division currently provides service to over 34,000 cellular customers in California's five (5) major markets plus a number of smaller markets. The cellular division also operates a wholesale cellular equipment business, a two-way radio sales dealership and a cellular and two-way radio and installation repair business. ComTech holds a Certificate of Public Convenience and Necessity from the State of California's Public Utilities Commission as both a reseller of cellular service and as a reseller of long distance service.

ComTech's second main division provides paging services to customers on systems operating on nationwide, regional and local PCP frequencies. Although ComTech is a recent entrant to the paging business, it currently provides service to customers utilizing in excess of 57,000 paging units.

2. In order to provide nationwide and regional coverage to customers who demand such service and to extend beyond its original local areas of operation, ComTech in 1992 applied for and received Part 90 PCP authorizations for regional and nationwide frequencies.<sup>2</sup> ComTech's regional and nationwide systems serve distinct subscriber needs as well as provide and employ different service offerings. At the present time, ComTech holds FCC authorizations for 929.4625 MHz in the region comprised of the States of California and Nevada, 929.8625 MHz in the regional area

---

<sup>2</sup> As is discussed in greater detail within, Comtech's regional and nationwide systems serve distinct subscriber needs and, as a result, employ different system architectures. See discussion infra to para. 8.



comprised of the states of Illinois, Iowa, Nebraska, Kansas, Minnesota, Michigan, Missouri, Wisconsin and South Dakota and operates a nationwide private carrier paging frequency on 929.5875 MHz. ComTech's local, regional and nationwide paging operations provide service from over 519 base station transmitters. In building out its system to provide service on a nationwide basis, ComTech entered into interconnection agreements with a number of other paging carriers pursuant to which ComTech's nationwide 929.5875 MHz frequency is transmitted in areas of the country where it does not otherwise currently conduct its operation under dedicated transmitters.

3. In the Notice of Proposed Rulemaking<sup>3</sup>, the Commission proposed that PCP licensees could earn exclusivity provided that they satisfy certain construction and coverage requirements.<sup>4</sup> The NPRM did not prohibit licensees from using multifrequency transmitters to meet their construction requirements.<sup>5</sup> Consistent with industry practice and with ComTech's business plan and with the perceived intent of the NPRM, ComTech continued to construct on a rapid basis its PCP system using multifrequency transmitters offering such paging service to the public in its operations. To date, ComTech has expended more than \$9.1 million dollars on its

---

<sup>3</sup> Notice of Proposed Rulemaking, PR Docket 93-35, 8 FCC Rcd. 2227 (1993) ("NPRM").

<sup>4</sup> See Section 90.495(a)(1)-(3).

<sup>5</sup> In this regard with few exceptions, the majority of interested parties commenting on this issue in the proceeding supported the continued use of multifrequency transmitters for purposes of qualifying for exclusivity.

PCP operations. It currently offers service to in excess of 57,000 units on its PCP frequencies in a coverage area which includes more than 90 of the top 100 MSA's.

4. Based upon the ability of a carrier to utilize multifrequency transmitters in its operation, ComTech would qualify for exclusivity on each of its PCP frequencies at the present time. In this respect, attached as Exhibit A is a report showing that ComTech has met the requirements for exclusivity on its nationwide channel. Attached as Exhibit B is a similar report showing that it has met the requirements for exclusivity on its regional frequency in California and Nevada. Attached as Exhibit C is a report which shows that it has met the requirements for exclusivity on its regional frequency in the midwest. Notwithstanding the support of the majority of commenting parties, the Commission implemented Rule Section 90.495(a)(5) which, when applied to constructed and operating systems, prohibits licensees from counting multiple frequency transmitters toward exclusivity on multiple frequencies. Therefore, even though ComTech provides PCP service to the public from over 519 current transmitters on its three (3) operating PCP frequencies, it needs to add an additional 292 dedicated transmitters in order to meet the dedicated transmitter requirement under the recently adopted rules.<sup>6</sup> Because of the number of additional transmitters required by

---

<sup>6</sup> Of the 519 PCP transmitters from which Comtech currently provides nationwide, regional and local service, 195 are owned and operated by Comtech and the remainder are in service pursuant to interconnection agreements.

ComTech to meet the dedicated transmitter rule and the failure in the Commission's Report and Order to allow for a transition period or slow growth period to apply to grandfathered or incumbent licensees, ComTech will need a temporary waiver of the multifrequency transmitter rule for 24 months in which to change-out its multifrequency transmitters to dedicated transmitters.<sup>7</sup>

## II. WAIVER SOUGHT

5. ComTech seeks a temporary waiver of Section 90.495(a)(5) of the Commission's rules to allow ComTech 24 months to add the 292 dedicated transmitters which are required in order to retain exclusivity for its nationwide and each of its regional, nationwide and local systems under Section 90.495(a)(5).<sup>8</sup> During the 24 month

---

<sup>7</sup> In a Public Notice issued on January 10, 1994, the Private Radio Bureau clarified certain procedures for grandfathered 929-930 MHz paging operators to qualify for exclusivity. Pursuant to the Public Notice, the Bureau clarified that in the case of incumbents who request exclusivity based on grand-fathered licenses or applications (i.e., licenses granted or applications filed prior to October 14, 1993) the eight (8) month deadline for demonstrating compliance with the Commission's exclusivity rules would run from the date the Commission issues a Public Notice conditionally designating the incumbent system as exclusive. Where an applicant's exclusivity request is based upon pre-October 14, 1993 applications which are pending but are not yet granted, the designation of exclusivity will occur when the last such application is granted.

<sup>8</sup> Certain of the additional dedicated transmitters will be placed in service at existing sites now operated on a multifrequency basis while others may be added at new locations to expand the geographic coverage of Comtech's system.

period, ComTech anticipates that it will add at least 120 transmitters in 1994 with the remaining 172 to be implemented in 1995.<sup>9</sup>

### III. GRANT OF COMTECH'S WAIVER IS APPROPRIATE

6. Grant of ComTech's Waiver will serve the public interest and is appropriate. In this regard, the Commission has stated that a waiver of a Rule is appropriate if the applicant can show special circumstances which warrant a deviation of the general rule.<sup>10</sup> The grant of ComTech's Waiver presents circumstances which justify a waiver of the rules and would not undermine the underlying rationale behind the adoption of Section 90.495(a)(5).

7. ComTech, to date, has expended in excess of \$9 million on the provision of PCP service and is committed to expend such additional investment as required to convert the use of its multifrequency transmitters to dedicated transmitters under Section 90.495(a)(5) of the Rules. ComTech's construction of its systems using both dedicated and multifrequency transmitters was consistent with existing industry practice and as permitted under Commission Rules. Taking such an approach, ComTech was able to offer to the

---

<sup>9</sup> Notwithstanding the implementation and use of dedicated transmitters, Comtech also anticipates that it will continue in its intercarrier arrangements until such time as its capacity needs require additional dedicated facilities in all areas. By continuing such arrangements, the public interest would be served by allowing Comtech's customers to be provided with system coverage not otherwise available in the short time frame required without some form of co-carrier arrangement.

<sup>10</sup> See WAIT Radio v. FCC, 418 F. 2d 1153 (D.C. Cir. 1969); In re Request of Fleet Call, Inc. for a Waiver and Other Relief to Permit Creation of Enhanced Specialized Mobile Radio Systems in Six Markets, 6 FCC Rcd. 1533 (1991).

public a competitive system at a cost which would benefit the public and not contribute to the warehousing or the growth in speculation of frequencies. ComTech's ongoing operation and history is clearly demonstrative of a bona fide operator which currently has over 500 base station facilities in service on its PCP frequencies. ComTech has 12 business offices and sales facilities and employs over 190 people in its various telecommunications services. In sum, there is no speculation by ComTech in the conduct of its business. Its clear intent is only the need for it to operate exclusively on its PCP frequencies.

8. ComTech's selection of frequencies and its decision to propose to dedicate a separate frequency for nationwide use is consistent with marketing demands which allow for the differing nature of nationwide and regional markets in operation and in satisfaction of customer needs. Those customers utilizing nationwide frequencies constitute a potentially large and growing segment of the marketplace which are dominated by various executives which need to be in touch when they are out of town or on business. The system architecture necessary for operation of such a system is to provide coverage along major traffic corridors and core business districts of major metropolitan areas includes coverage of airports. In contrast, configuration on a regional system takes into account different types of paging use, service provided and coverage requirements. Such regional systems require significantly greater build-out and penetration in a particular area to accommodate coverage and user demands.

9. The underlying rationale of the multifrequency transmitter rule for qualification of exclusivity was to prevent licensees from claiming multiple channel exclusivity with only a limited investment.<sup>11</sup> This is not the case with ComTech's already demonstrated investment and operation in the paging industry. The Commission's own requirements of 70 transmitters per region at \$20,000.00 per transmitter for purposes of qualification for nationwide exclusivity on one (1) channel is that a \$6 million investment is necessary. The required investment for regional exclusivity for two (2) regions would be \$2,800,000.00. ComTech's investment of in excess of \$9.1 million to date is already in excess of the separate bench mark amounts established by the Commission evidencing satisfactory commitment to justify multiple channel exclusivity. It is clear, therefore, that ComTech's Waiver Request herein does not violate the underlying intent of the Rule.

10. Without the ability of an incumbent paging carrier utilizing multi-frequency transmitters to transition from the use of such multi-frequency transmitters to dedicated transmitters in an orderly fashion, carriers are faced with the artificial requirement to reconstruct transmitters in a period of time which is unrealistic, uneconomical and opposed to the public interest. Without a grant of the Waiver herein requested, ComTech would be faced with the nearly impossible task of having to find an acceptable number of transmitters available as well as find the man-power to implement construction in a very unrealistic time

---

<sup>11</sup> See Report and Order, para 17.

frame. In this respect, ComTech has been in discussions with a number of major vendors of 900 MHz paging base stations and has concluded that it would be extremely difficult if not impossible to secure, in an adequate time frame, the minimum of 292 transmitters necessary to implement a dedicated transmitter change-out.<sup>12</sup> There is no doubt that there will be a significant log jam by all of the licenses at 900 MHz attempting to construct facilities and change over multifrequency transmitters all at the same time in order to meet the construction time frame set forth in the Report and Order.

11. Further, even if ComTech were able to procure all of the necessary transmitters within the time frame, it would still be faced with an unreasonable demand on its technical staff as well as on various site technicians and site installers to install all of the transmitters within the limited time frame. Similar to the simultaneous demand placed upon the vendors for equipment at one time by the various licenses, so too would independent contractors also be in a similar position. In short, the lack of personnel and lack of available transmitters make the conversion from

---

<sup>12</sup> Comtech's dealings in this area generally demonstrate that manufacturers are often reluctant to admit that they may not be able to fill a customer's large order. However, the reality is that the Commission's actions in the Report and Order has put enormous pressure upon the manufacturers to deliver equipment throughout the country to a number of carriers, at the same time. In this respect, both Motorola and Glenayre have indicated that they have recognized difficulties in their delivery schedules caused by the Commission's exclusivity rules and the possibility that they would be unable to fill any large orders until late 1994. Further, the natural market place workings often lead to delivery significantly beyond the date of manufacturers original projected dates.

multifrequencies to dedicated transmitters, at best, uncertain and, in all probability, impossible.

#### **IV. GRANT OF COMTECH'S WAIVER WILL BE IN THE PUBLIC INTEREST**

12. To the extent manufacturers are unable to deliver equipment in a timely fashion or to the extent sites are not available or to the extent operators are forced to purchase and expend funds without the ability to budget and transition their already operating systems in an orderly fashion will not serve the public interest. Such a requirement will only create the needless expenditure of funds, time and energy within an unrealistic time period which may only need to be redone at a later date. These pressures placed upon a company at one time could put unfair pressure as to routine maintenance, repair and service upon existing systems which satisfy current customer service and needs. It would draw away from the orderly operation of its current systems in order to meet an artificial construction date not otherwise anticipated upon the original adoption of the NPRM.

13. The second reason why the public interest would not be served if the waiver is not granted relates to the fact that ComTech is currently offering service to more than 57,000 units on its PCP systems. To the extent ComTech is not able to reconstruct within the deadline given by the Commission without a waiver, its system would be forced to share which would be contrary to the underlying intent originally adopted to further the development of a number of competitive exclusive local, regional and nationwide carriers as proposed in PR Docket No. 93-35. Further, it would



cause technical difficulties to the system not only because it would be shared but because it would require changes in interconnection of its facilities which would require a co-channel licensee seeking to share the channel to interconnect to ComTech's up-link facilities. This would immediately cause problems of capacity as well as limit the geographic coverage and use of the frequency as otherwise intended by ComTech in its original commitment to construction and operation of its systems.

14. Further, recognition of the need for temporary waiver of the Rule section will allow the orderly transition by ComTech to continue in operation and to implement their system in an orderly fashion in such a way so as to continue to provide regional and nationwide competition. This competition, as the Commission well knows, leads to competitive market places which benefits the customers in offering to that customer a variety of services, carriers and pricing.

15. Finally, given the fact that a number of parties<sup>13</sup> have filed Petitions for Reconsideration and Clarification of the Commission's Report and Order, amongst which they have asked the Commission to reconsider and to allow extended implementation to existing or grandfathered licensees, grant of this temporary waiver pending the Commission's rule making or in conjunction with its Reconsideration will allow ComTech time to transition and to employ

---

<sup>13</sup> See e.g. the Petition for Reconsideration and Clarification filed by the Association for Private Carrier Paging Section of the National Association of Business and Educational Radio, Inc.

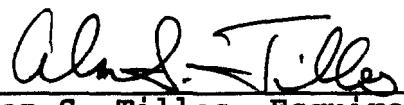
additional dedicated transmitters in its systems in an orderly process in the conduct of its business.

**V. CONCLUSIONS**

For the reasons set forth above, ComTech respectfully requests the Commission to immediately grant the Temporary Waiver of Rule Section 90.495(a) as set forth hereinabove.

Respectfully submitted,  
ComTech, Inc.

By:   
David E. Weisman, Esquire

By:   
Alan S. Tilles, Esquire  
Its Attorneys  
Meyer, Faller, Weisman and  
Rosenberg, P.C.  
4400 Jenifer Street, N.W.  
Suite 380  
Washington, D.C. 20015  
(202) 362-1100

January 27, 1994

WPBN995		AL	BIRMINGHAM 1 81ST ST	BIRMINGHAM	Y	
WPBN995		AL	HUNTSVILLE MOUNTAIN MISS ANNS RD	HUNTSVILLE	Y	
WPCT690		AL	2980 SMILEY AVENUE	PRICHARD	Y	
WPBN995		AL	3251 HARRISON RD	MONTGOMERY	Y	
WPBN995		AL	ATOP OAK MOUNTAIN	BIRMINGHAM	Y	
WPDC431		AR	FARM II TOWER / 3.6 MI. W HWY 94 ON RICE	BENTONVILLE	Y	
WNZZ833		AR	424 WEST 6TH ST	LITTLE ROCK	Y	
WPBU602		CA	8 OF A CONCORD 2000 CLAYTON RD	CONCORD	Y	@ #
WPCQ268		CA	ARCO TOWER 515 S FLOWER	LOS ANGELES	Y	@ #
WPBU609		CA	RIVERSIDE HOSPITAL 4445 MAGNOLIA AVE	RIVERSIDE	Y	@ #
WPBU607		CA	EDOM HILL 6.5 MI E	PALM SPRINGS	Y	@ #
WPBU607		CA	INDIO HILL 5 MI N	INDIO	Y	@ #
WPCQ267		CA	BANK OF AMERICA WORLD HEADQUARTERS	SAN FRANCISCO	Y	@ #
WPBU602		CA	308 PASTEUR DR	STANFORD	Y	@ #
WPDG745		CT	CORNER OF WESTVIEW & BEECHWOOD DR	DANBURY	Y	
WPCZ709		CT	GILLY LANE OFF DEER RUN ROAD	WILTON	Y	
WPDJ445		CT	175 JEFFERSON STREET	FAIRFIELD	Y	
WPDG745		CT	1241 MAIN STREET	BRIDGEPORT	Y	
WPCT722		CT	6 SHIRLEY STREET	NORWALK	Y	
WPAR464		CT	44 STRAWBERRY HILL CT	STAMFORD	Y	
WPCZ760		CT	411 WEST PUTNAM	GREENWICH	Y	
WPAR463		CT	SHERATON HOTEL AT BRADLEY INTL ARPRT	WINDSOR LOCKS	Y	
WPBN205		CT	81 MONTEVIDEO RD	AVON	Y	
WPAR463		CT	40 WOODLAND ST	HARTFORD	Y	
WPCZ760		CT	1 GOLD STREET	HARTFORD	Y	
WPCZ760		CT	JOHN TOM HILL	GLASTONBERRY	Y	
WPCJ915		CT	RATTLESNAKE MOUNTAIN	FARMINGTON	Y	
WPCT722		CT	1210 HIGHLAND AVE	TORRINGTON	Y	
WPCZ760		CT	CHAPIN ROAD	NEW MILFORD	Y	
WPD8915		CT	14 CONNECTICUT ROUTE 30	KILLINGWORTH	Y	
WPDG745		CT	342 MIDDLESEX TURNPIKE	OLD SAYBROOK	Y	
WPBN205		CT	GARDEN HILL AND FARMDALE DR	WATERBURY	Y	
WPD8915		CT	WEST PEAK DRIVE ON MERIDEN MOUNTAIN	MERIDEN	Y	
WPCZ760		CT	19 TOMLINSON ROAD	SEYMOUR	Y	
WPAR463		CT	1085 WINTERGREEN AVE	HAMDEN	Y	
WPBN205		CT	789 HOWARD AVE	NEW HAVEN	Y	
WPDG745		CT	480 SAWMILL RD	WEST HAVEN	Y	
WPCJ915		CT	2047 BRIDGEPORT AVENUE	MILFORD	Y	
WPCZ709		CT	2 BROADWAY TERRACE	NORWICH	Y	
WPBW302		CT	BUCKLEY HILL NEAR GOLDBERG ROAD	COLCHESTER	Y	
WPCT722		CT	WINTCHOG HILL	NORTH STONINGTON	Y	
WPCT722		CT	43 GRANITE STREET	NEW LONDON	Y	
WPDG745		CT	SEARS RD	STAFFORDVILLE	Y	
WPAR463		CT	INT OLD POST RD & MOUNTAIN SPRINGS RD	TOLLAND	Y	
WPCJ915		CT	.25 MILES NORTH OF EAGLEVILLE ROAD	STORRS	Y	
WPBW302		CT	NORTH ROAD	EAST KILLINGLY	Y	
WPEB307		DC	2800 WISCONSIN AVE	WASHINGTON	Y	
WPDE644		DC	NATIONAL PRESS BUILDING	WASHINGTON	Y	
WPDH814		DC	6318 FIRST PLACE NE	WASHINGTON	Y	
WPDS251		DC	400 NEW JERSEY AVE NW	WASHINGTON	Y	
WPDG770		DE	1 ROLLINS PLAZA	WILMINGTON	Y	
WPCR538		IA	2200' SW OF WILSON AVE. & 6TH ST.	CEDAR RAPIDS	Y	*
WPD8228		IA	4030 DELAWARE	DES MOINES	Y	*
WPCR538		IA	INDIANA AVE & WELLS FERRY RD	BETTENDORF	Y	*

WPCM706		ID	TABLE ROCK	BOISE	Y	+	*
WPCR460		IL	ONE QUINTRON WAY	QUINCY	Y		*
WPCR431		IL	2.5 MI SSE	BELVIDERE	Y		*
WPBJ843		IL	SHERATON N SHORE 933 SKIIE BLVD	NORTHBROOK	Y	+	* @
WPBB391		IL	800 PLAZA DR	SCHAUMBURG	Y	+	* @
WPBB391		IL	SHERATON INTL	ROSEMONT	Y	+	* @
WPBJ811		IL	5415 N SHERIDAN RD	CHICAGO	Y	+	* @
WPBQ537		IL	1ST NATL BANK 1 FIRST NATIONAL PLZ	CHICAGO	Y	+	* @
WPBB391		IL	NB JANET LN 1 E KITTY AVE	CHICAGO RIDGE	Y	+	* @
WPCR431		IL	2235 GATEWAY DRIVE	SYCAMORE	Y		*
WPBJ811		IL	2233 S HIGHLAND AVE	LOMBARD	Y	+	* @
WPBQ537		IL	LEMONT RD AND 103RD ST	BOLLINGBROOK	Y	+	* @
WPCR539		IL	3/8 MI W OF US 45, 3 MI N OF EFFINGHAM	EFFINGHAM	Y		*
WPBJ843		IL	10N480 NESTLER RD	ELGIN	Y	+	* @
WPBQ537		IL	HUHN TRUCKING 1950 BITTER RD	AURORA	Y	+	* @
WPBQ537		IL	18800 S OAK PK	TINLEY PARK	Y	+	* @
WPDV212		IL	1405 W. JEFFREY	KANKAKEE	Y		* @
WPBJ843		IL	MELKA 32083 N O PLAINE RD	GURNEE	Y	+	* @
WPBJ843		IL	25705 FAIRFIELD RD	LAKE ZURICH	Y	+	* @
WPDT307		IL	2044 N WALNUT GROVE	DECATUR	Y		*
WPBB391		IL	KISHWAUKEE VALLEY RD & BORDEN	WOODSTOCK	Y	+	* @
WPDT307		IL	1 MI WEST OF	NORMAL	Y		*
WPCR539		IL	.25 MI S OF RT 29 & 1 MI E OF RT 55	SPRINGFIELD	Y		*
WPCR539		IL	.7 MI S OF 1474.2 MI W OF COLE HOLLOW RD	EAST PEORIA	Y		*
WPBQ537		IL	1/4 MI W OF RT 6 & LARKIN	JOLIET	Y	+	* @
WPBJ843		IL	CAMELOT TWR 1415 E STATE ST	ROCKFORD	Y	+	* @
WPCR543		IN	BUTLER & HILLEGAS RDS	FT. WAYNE	Y		*
WPDR402		IN	1.5 MI S HWY 35	KOKOMO	Y		*
WNZT204		IN	4200 N & 525 W	LA PORTE	Y	+	* @
WPBB391		IN	SAINT MARGARETS 5454 HOHMAN AVE	HAMMOND	Y	+	* @
WPCR541		IN	AUL BUILDING, ONE AMERICAN SQ	INDIANAPOLIS	Y		*
WPBG840		IN	800 N & 49 BYP	VALPARAISO	Y	+	* @
WNZT204		IN	211 W WASHINGTON	SOUTH BEND	Y	+	* @
WPCR536		IN	420 MAIN ST	EVANSVILLE	Y		*
	932910056	KS	95TH AND WOODLAND	LENEXA	Y		*
WPCQ288		KS	250 W. DOUGLAS BLVD	WICHITA	Y		*
WPCR478		KY	2500 PALUMBO DR	LEXINGTON	Y	+	*
WPDM260		KY	800 S 4TH ST	LOUISVILLE	Y		*
WPKD426		LA	SHREVEPORT 3 / 2026 DESOTO ROAD	SHREVEPORT	Y		
WPCR540		LA	.7 MI W OF INT. OF HWY 108 & SWISCO RD.	SULPHUR	Y		
WPBP220		LA	ONE AMERICAN PL	BATON ROUGE	Y		
WPBP220		LA	ENERGY CENTRE 1100 POYDRAS ST	NEW ORLEANS	Y		
WPCR540		LA	ALEXANDRIA TOWER / 1.8 MI S INT HWY 488	ALEXANDRIA	Y		
WPBP220		LA	38181 SLOAT RD	SLIDELL	Y		
WPCE309		MA	OFF FREEMANS WAY - WXFR	BREWSTER	Y		
WPCE309		MA	OAK STREET	BARNSTABLE	Y		
WPCP301		MA	585 WINTHROP STREET	TAUNTON	Y		
WPCE309		MA	COPICUT HILL	FALL RIVER	Y		
WPCZ761		MA	RESERVOIR HILL	METHUEN	Y		
WPCP301		MA	424 ESSEX STREET	LYNN	Y		
WPBS497		MA	10 CHESTNUT ST	SPRINGFIELD	Y		
WPCZ761		MA	803 MERRIMACK STREET	LOWELL	Y		
WPBU599		MA	773 SALEM ST	NORTH WILMINGTON	Y		
WPBU599		MA	PROSPECT HILL	WALTHAM	Y		

WPCP301		MA	NOBSCOTT HILL, 5 MILES NORTH OF	FRAMINGHAM	Y	
WPAR465		MA	90 CUSHING AVE	DORCHESTER	Y	
WPBU599		MA	10 YORK AVE	RANDOLPH	Y	
WPCP301		MA	ROUTE 1 AT WALPOLE MOTEL	WALPOLE	Y	
WPCP301		MA	BEDFORD STREET	BROCKTON	Y	
WPCE309		MA	RTE 3A, 1 MI N OF PILGRIM POWER STATION	PLYMOUTH	Y	
WPBU599		MA	OLD SOLDIERS HOME 91 CREST AVE	CHELSEA	Y	
WPBU599		MA	16 N BEACON ST UNION SQ	ALLSTON	Y	
WPBU599		MA	ASHBURNHILL HILL	PAXTON	Y	
WPDR331		ME	TATNIC HILL ROAD	WELLS	Y	
WPCM764		MI	MORGAN & WAUBASCON	BATTLE CREEK	Y	+ *
WPDB229		MI	328 S SAGINAW ST	FLINT	Y	*
WPCM764		MI	910 RIVER ST	LANSING	Y	+ *
WPCW645		MI	2020 VIDEO LANE	JACKSON	Y	+ *
WPCM764		MI	5086 W MICHIGAN	KALAMAZOO	Y	+ *
WPBJ846		MI	1308 FLYMOUNT RD NE	BYRON CENTER	Y	+ *
WPDB229		MI	2380 BROWN RD	PONTIAC	Y	*
WPCM764		MI	26806 EVERGREEN	SOUTHFIELD	Y	+ *
WPBJ846		MI	1080 TREANOR RD	SAGINAW	Y	+ *
WPDB229		MI	UNIVERSITY TOWERS; 536 S. FOREST AVE.	ANN ARBOR	Y	*
WPKD377		MI	13000 PRAIRIE	DETROIT	Y	*
WPCW645		MI	65 CADILLAC SQUARE	DETROIT	Y	+ *
WPBC976		MI	23409 MICHIGAN AVE	DEARBORN	Y	+ *
WPCT719		MN	PILLSBURY CENTER; 200 6TH ST. S	MINNEAPOLIS	Y	*
WPCT719		MN	7901 24TH AVE S	BLOOMINGTON	Y	*
WPDT303		MN	ASSOCI HEIGHTS	ROCHESTER	Y	*
WPCT707		MN	SKYLINE; 1247 ST. ANTHONY AVE.	ST. PAUL	Y	*
WPCR542		MO	3531 S SCENIC	SPRINGFIELD	Y	*
WPCR457		MO	ONE KANSAS CITY PLACE	KANSAS CITY	Y	*
WPCT704		MO	7301 NW TIFFANY SPRINGS RD	KANSAS CITY	Y	*
WPCT706		MO	KHTK / KXOX RADIO TOWER	O FALLON	Y	*
WPCT706		MO	MONTGOMERY TOWER; 10330 PAGE IND. BLV	OVERLAND	Y	*
WPCT705		MO	310 S. GRAND BLVD(COUNCIL HOUSE)	ST. LOUIS	Y	*
WPCR459		MS	140 ALPHA ONE ROAD / 1.9 MI SW OF SR18	JACKSON	Y	
WPDM302		MT	1536 COLBURN RD	BILLINGS	Y	*
WPDS253		NC	CANE CREEK MTN; 9 MI S OF BURLINGTON	BURLINGTON	Y	
WPDR483		NC	ATOP MT SPIVEY	ASHEVILLE	Y	
WPDS249		NC	526 MAIN AVENUE	HICKORY	Y	
WPDR484		NC	1000 WILLIAM CLARK RD	FAYETTEVILLE	Y	
WPDS252		NC	2313 CROATAN HIGHWAY	NAGS HEAD	Y	
WPDS253		NC	1519 CAMDEN AVE	DURHAM	Y	
WPDR484		NC	.4 MI FR US 70E	DURHAM	Y	
WPBM966		NC	2400 N LIBERTY ST	WINSTON SALEM	Y	
WPBM966		NC	1007 WARREN ST	GREENSBORO	Y	
	932850165	NC	TWO FIRST UNION/ 300 SOUTH COLLEGE ST.	CHARLOTTE	Y	
	932850165	NC	INDEPENDENCE TWR BLDG	CHARLOTTE	Y	
WPDR485		NC	SUNNYVALE RD	WILMINGTON	Y	
WPDR484		NC	136 E ROSEMARY ST	CHAPEL HILL	Y	
WPDS253		NC	434 FAYETVILLE ST MALL	RALEIGH	Y	
WPCQ287		NE	801 S 32ND ST.	OMAHA	Y	*
	932850064	NE	FIRSTIER BLDG; 13TH L ST.	LINCOLN	Y	
WPCZ761		NH	MOUNT UNCANOONUC	GOFFSTOWN	Y	
WPCZ761		NH	TRIGATE ROAD ON MERRILL HILL	HUDSON	Y	
WPCZ761		NH	LITTLE POND ROAD	CONCORD	Y	

WPCZ761	NH	815 LAFAYETTE ROAD	PORTSMOUTH	Y	
WPBM998	NJ	3100 BOARDWALK	ATLANTIC CITY	Y	
WPMB997	NJ	RYE CLIFF	OAKLAND	Y	
WPCM747	NJ	ROUTE 9W, ARMSTRONG TOWER	ALPINE	Y	
WPDG770	NJ	7TH & LINDEN STREETS	CAMDEN	Y	
WPBW303	NJ	CHURCH AVENUE N OF CHEW ROAD	WATERFORD WORKS	Y	
WPMB997	NJ	CLARIDGE RD	VERONA	Y	
WPAR464	NJ	115 ELIZABETH AVE	NEWARK	Y	
WPBW303	NJ	GROSS DR	GLEN GARDNER	Y	
WPAR467	NJ	101 SLOAN AVE	MERCERVILLE	Y	
WPMB997	NJ	ONE TOWER CTR	EAST BRUNSWICK	Y	
WPCM745	NJ	OLD WALK TOWER ON WEST BANGS AVENUE	NEPTUNE	Y	
WPDB915	NJ	7 ROCK RIDGE ROAD	DOVER	Y	
WPCM745	NJ	485 WESTERN AVE	MORRISTOWN	Y	
WPBW303	NJ	HERFLICKER BLVD	TOMS RIVER	Y	
WPCM745	NJ	337 DRIFTWAY ROAD	GREENBROOK	Y	
WPBW303	NJ	EAST MOUNTAIN RD	SPARTA	Y	
WPCP926	NM	INTERSECTION OF US 66 & IH40	ALBUQUERQUE	Y	
WPAR464	NY	81 COLVIN AVE	ALBANY	Y	
WPDB914	NY	HONNESS MOUNTAIN	FISHKILL	Y	
WPBW258	NY	N BEACON MOUNTAIN	BEACON	Y	
WPCN327	NY	10 SEVENTH STREET	BUFFALO	Y	
WPBW306	NY	GRAFFENBURG HILL	HERKIMER	Y	
WPCM745	NY	248 HOPKINSON AVENUE	BROOKLYN	Y	
WPDB915	NY	CONVENT AVENUE	SYOSSET	Y	
WPDB915	NY	GLENN CURTIS BLVD	UNIONDALE	Y	
WPBN202	NY	40 MOSHOLU PKY	BRONX	Y	
WNZT200	NY	124 W 89TH ST	NEW YORK	Y	
WPBN202	NY	3 PARK AVE	NEW YORK	Y	
WPDG740	NY	ONE CHASE MANHATTAN PLAZA	MANHATTAN	Y	
WPBN202	NY	700 VICTORY BLVD	STATEN ISLAND	Y	
WPDB914	NY	7 BARGER HILL ROAD	PUTNAM VALLEY	Y	
WPCZ709	NY	138-10 136TH AVENUE	JAMAICA	Y	
WPBW258	NY	1300 MASSACHUSETTS AVE	TROY	Y	
WPDB915	NY	172 ROUTE 59	MONSEY	Y	
WPBW258	NY	N SIDE OF CRAWFORD RD ON CRWFD HILL	ROTTERDAM	Y	
WPCZ709	NY	MILLSTONE RD .3KM N OF MIDDLELINE ROAD	NOYACK	Y	
WPBW305	NY	CTY RT 111	MANORVILLE	Y	
WPBW305	NY	WHEELER RD & MOTOR PKWY	CENTRAL ISLIP	Y	
WPBW258	NY	ILLINOIS MOUNTAIN 1.8 MI W	HIGHLAND	Y	
WPDB914	NY	105 MARY'S AVENUE	KINGSTON	Y	
WPCM747	NY	TRIPP STREET	MOUNT KISCO	Y	
WPAR464	NY	111 GROVE ST	WHITE PLAINS	Y	
WPCS809	OH	4805 CENTRAL AVE	MIDDLETOWN	Y	+
WPCS809	OH	3247 MACK RD	FAIRFIELD	Y	+
WPCS809	OH	80 W BROAD ST	COLUMBUS	Y	+
WPCS809	OH	8TH ST & MATSON PLACE	CINCINNATI	Y	+
WPDD780	OH	ODGE HWY & NORFOLK/WESTERN RR; 2 MI N	FINDLAY	Y	*
WPDB229	OH	OHIO CITIZENS BUILDING; 405 MADISON AVE	TOLEDO	Y	+
WPCS809	OH	1538 FIRST NATIONAL BANK	DAYTON	Y	+
WPDM252	OK	1700 S. MISSOURI	OKLAHOMA CITY	Y	
WPDM252	OK	4TH NATIONAL BANK BLDG.; 6TH AND BOULD	TULSA	Y	
WPDD859	OR	MCDONALD FOREST 4 MI N OF	CORVALLIS	Y	*
WPCM703	OR	MOUNT SCOTT 5 MI E	MILWAUKIE	Y	+

WPCM703		OR	BLANTON	EUGENE	Y	+	*
WPCM703		OR	HEALY HEIGHTS 4504 SW CARL PL	PORTLAND	Y	+	*
WPCM703		OR	BALD HILL	SALEM	Y	+	*
WPCM703		OR	BALD PEAK 24705 MOUNTAIN TOP ROAD	NEWBERG	Y	+	*
WPCY894		PA	451 MOON CLINTON ROAD	CORAOPOLIS	Y		
WPDM285		PA	122 BLUEBELL ST	PITTSBURGH	Y		
WPCY894		PA	130 SECO ROAD	MONROEVILLE	Y	+	
WPCY894		PA	717 LIBERTY AVENUE	PITTSBURGH	Y	+	
WPCY894		PA	1405 CRANE AVENUE	PITTSBURGH	Y	+	
WPCY838		SC	800 FT. N. OF BUCK ISLAND RD.	BLUFFTON	Y		
	932850164	SC	WEAVER 1200 VENNING ROAD	MT. PLEASANT	Y		
WPBM929		SC	PARIS MOUNTAIN ATOP PARIS MOUNTAIN	GREENVILLE	Y		
	932850164	SC	286 ORCHARD DRIVE	COLUMBIA	Y		
	933260272	SC	784 NORTH CHURCH STREET	SPARTANBURG	Y		
	932850065	SD	1080 SUBURBAN DRIVE	SIOUX FALLS	Y		
WPDU993		TN	TODD'S KNOB	DONNELSON	Y		
WPDW406		TN	401 CHURCH ST	NASHVILLE	Y		
WPDR722		TN	VIRGIN MTN	GREENVILLE	Y		
WPDR722		TN	CROCKETTS RIDGE	MORRISTOWN	Y		
WPDR722		TN	LOOKOUT MTN	CHATTANOOGA	Y		
WPDW407		TN	WHITE OAK MTN	CHATTANOOGA	Y		
WPBJ798		TN	SHARPS RIDGE/331 SHARPS RIDGE ROAD	KNOXVILLE	Y		
WPBJ798		TN	7434 RALEIGH LAGRANGE ROAD	CORDOVA	Y		
WPBJ798		TN	181 TENNESSEE BANK/185 MADISON AVENUE	MEMPHIS	Y		
WPDW483		TN	3470 TENULAHOMA	MEMPHIS	Y		
WPDR722		TN	BAYS MTN	KINGSPORT	Y		
WPDR722		TN	BUFFALO MTN	JOHNSON CITY	Y		
WPDU993		TN	1488 OLD HICKORY BLVD	BRENTWOOD	Y		
WPKD388		TX	8911 SAN PEDRO	SAN ANTONIO	Y		
WPBS492		TX	NBC PLZ 112 E PECAN	SAN ANTONIO	Y		
WPBC633		TX	5.75 MI E OF ALVIN ARPT	ALVIN	Y		
WPCQ277		TX	0.8 MI. E. OF HWY 21 & 28TH ST.	BRYAN	Y		
WPCQ278		TX	3.5 MI. N. OF HWY 83 & .3 MI. E. OF	LOS FRESNOS	Y		
WPAX995		TX	FRISCO 2 1500' SE OF INT CR154 & CR152	ALLEN	Y		
WPBC632		TX	PALUBADES 2435 N CENTRAL EXPY	RICHARDSON	Y		
WPAX995		TX	CRAWFORD TWR WESTMORELAND & REDMO	DALLAS	Y		
WPBC632		TX	2800 MEMORIAL PKY	MESQUITE	Y		
WPAX995		TX	DENTON 2 MAYHILL & HWY 35E	DENTON	Y		
WPBC632		TX	2460 ROCKBROOK	LEWISVILLE	Y		
WPKD392		TX	.84 SSW OF INT. OF HWY 80 & W COUNTY RD	ODESSA	Y		
WNZZ833		TX	COMANCHE PEAK / KROD TOWER	EL PASO	Y		
WPBC633		TX	13827 STAFFORD RD	STAFFORD	Y		
WPKD493		TX	512 HUNTINGTON RD 1 MI N OF HWY 36	ROSENBERG	Y		
WPKD493		TX	.5 MILES N W OF INT OF W HWY	PORT BOLIVAR	Y		
WPAX995		TX	HOWE 2 1 MI NW US 75 & FM 902 INT	HOWE	Y		
WPBC633		TX	18916 BELLEAU WOOD DR 2 MI NE	HUMBLE	Y		
WPBC633		TX	DERRINGTON 8838 DERRINGTON ST	HOUSTON	Y		
WPKD493		TX	KATY 1 HOLIDAY INN CRN PLZ 14703 PARK RO	HOUSTON	Y		
WPCQ277		TX	MOTOROLA BAYTOWN TOWER / 4805 W. BAK	BAYTOWN	Y		
WPBC633		TX	DAYS INN 801 CALHOUN	HOUSTON	Y		
WPCQ277		TX	5 GREENWAY PLAZA	HOUSTON	Y		
WPBM920		TX	ON FM 2770 3 MI S	BUDA	Y		
WPCQ278		TX	3.5 MI. N. OF 23RD ST.	MCALLEN	Y		
WPKD493		TX	BEAUMONT / 1300 HILDEBRANDT RD.	BEAUMONT	Y		

WNZZ833		TX	METRO TOWER / 1220 BROADWAY	LUBBOCK	Y	
WPBM917		TX	BOSQUE 42ND AND BOSQUE ST	WACO	Y	
WPDK392		TX	1904 WAREHOUSE ROAD	MIDLAND	Y	
WPCQ278		TX	800 LEOPARD STREET	CORPUS CHRISTI	Y	
WPBS492		TX	2200 E 10TH ST	AMARILLO	Y	
WPBS492		TX	1702 E COMMERCE ST	TYLER	Y	
WPAX995		TX	.5 MI S OF US HWY 183	EULESS	Y	
WPAX995		TX	2740 SOUTH FWY	FORT WORTH	Y	
WPBM920		TX	NOND AUSTIN 515 CONGRESS AVE	AUSTIN	Y	
WPDK493		TX	1.25 MI ESE OF COURTHOUSE	HUNTSVILLE	Y	
WPBM917		TX	1 MI NE OF WESTINGHOUSE & IH35	GEORGETOWN	Y	
WPCM707		WA	MT LIVINGSTON	CAMAS	Y	+ *
WPCJ898		WA	MAYNARD PEAK	PORT TOWNSEND	Y	+ *
WPCJ898		WA	1001 4TH AVE	SEATTLE	Y	+ *
WPCJ898		WA	COUGER MOUNTAIN	ISSAQUAH	Y	+ *
WPDC451		WA	RED LION 18740 PACIFIC HWY S	SEATTLE	Y	*
WPCJ898		WA	GOLD MOUNTAIN	BREMERTON	Y	+ *
WPCQ237		WA	CREGO HILL	CHEHALIS	Y	+ *
WPCQ237		WA	ST JOSEPH'S HOSPITAL	TACOMA	Y	+ *
WPCJ898		WA	SPAR POLE HILL 6 MI SE OF	ORTING	Y	+ *
WPCJ898		WA	CLEARVIEW HILL	EVERETT	Y	+ *
WPCM708		WA	FANCHER BEACON HILL	SPOKANE	Y	+ *
WPCQ237		WA	ALARM CENTER	LACEY	Y	+ *
WPCM704		WA	AHTANUM RIDGE	YAKIMA	Y	+ *
WPCT703		WI	1048 GRAY CT	GREEN BAY	Y	*
WPBG880		WI	3 S PINKNEY ST	MADISON	Y	+ * @
WPBG880		WI	808 W WISCONSIN AVE	MILWAUKEE	Y	+ * @
WPBG880		WI	N 2 MILE RD	FRANKSVILLE	Y	* @
WNZS996		WI	4634 CASE DR	JANESVILLE	Y	+ * @
WNZS996		WI	WAUKESHA TOWER	WAUKESHA	Y	+ * @

TOTAL= 300

+ = 929.6875  
 \* = 929.8625  
 @ = 929.4625  
 # = 929.1125



MEYER, FALLER, ET

P.02

TO

FROM COMTECH PAGING

14:38

JAN-26-1994

WPCR551	IA	INDIANA AVE. & WELLS FERRY RD.	BETTENDORF	SCOTT	IA, DAVENPORT-ROCK IS.	Y	*
WPCY853	IA	4030 DELAWARE	DES MOINES	POLK	IA, DES MOINES	Y	*
WPCR551	IA	2207 SW OF WILSON AVE. & 6TH ST.	CEDAR RAPIDS	LINN	IA, STATE OF	Y	*
WPDV204	IL	5415 N SHERIDAN RD	CHICAGO	COOK	IL, CHICAGO-NW IND	Y	@ # *
WPDV204	IL	2233 S HIGHLAND AVE	LOMBARD	DU PAGE	IL, CHICAGO-NW IND	Y	@ # *
WPCT680	IL	340 MI W OF US 45, 3 MI N OF EFFINGHAM	EFFINGHAM	EFFINGHAM	IL, CHICAGO-NW IND	Y	*
WPCR395	IL	2.5 MI SSE	BELVIDERE	BOONE	IL, CHICAGO-NW IND	Y	*
WPCR395	IL	2255 GATEWAY DRIVE	SYCAMORE	DE KALB	IL, CHICAGO-NW IND	Y	*
WPBJ816	IL	SHERATON N SHORE 833 SKOKIE BLVD	NORTHBROOK	COOK	IL, CHICAGO-NW IND	Y	@ # *
WPBJ816	IL	10N450 NESTLER RD	ELGIN	KANE	IL, CHICAGO-NW IND	Y	@ # *
WPBJ816	IL	25705 FAIRFIELD RD	LAKE ZURICH	LAKE	IL, CHICAGO-NW IND	Y	@ # *
WPBJ816	IL	CAMELOT TWR 1415 E STATE ST	ROCKFORD	WINNEBAGO	IL, CHICAGO-NW IND	Y	@ # *
WPBJ814	IL	1ST NATL BANK 1 FIRST NATIONAL PLZ	CHICAGO	COOK	IL, CHICAGO-NW IND	Y	@ # *
WPBJ814	IL	LEMONT RD AND 103RD ST	BOLLINGBROOK	DU PAGE	IL, CHICAGO-NW IND	Y	@ # *
WPBJ814	IL	18800 S OAK PARK	TINLEY PARK	KANE	IL, CHICAGO-NW IND	Y	@ # *
WPBJ814	IL	MUNN TRUCKING 1950 BITTER RD	AURORA	KANE	IL, CHICAGO-NW IND	Y	@ # *
WPBJ814	IL	1/2 MI W OF RT 6 & LARKIN	JOLIET	WILL	IL, CHICAGO-NW IND	Y	@ # *
WPBJ812	IL	SHERATON INTERNATIONAL	ROSEMONT	COOK	IL, CHICAGO-NW IND	Y	@ # *
WPBJ812	IL	NS JANET LN 1 E KITTY AVE	CHICAGO RIDGE	COOK	IL, CHICAGO-NW IND	Y	@ # *
WPBJ812	IL	800 PLAZA DR	SCHAUMBURG	COOK	IL, CHICAGO-NW IND	Y	@ # *
WPBJ812	IL	WOODSTOCK KISHAWA WALKER VALLEY RD & BOR	WOODSTOCK	MCHENRY	IL, CHICAGO-NW IND	Y	@ # *
WPDV200	IL	1405 W. JEFFREY	KANKAKEE	KANKAKEE	IL, STATE OF	Y	@ *
WPDV200	IL	1 MI WEST OF	NORMAL	MCLEAN	IL, STATE OF	Y	*
WPCT680	IL	.25 MI S OF RT 29 & 1 MI E OF RT 56	SPRINGFIELD	SANGAMON	IL, STATE OF	Y	*
WPCT767	KS	250 W. DOUGLAS BLVD	WICHITA	SEDGWICK	KS, WICHITA	Y	*
WPKD385	KY	800 S 4TH ST	LOUISVILLE	JEFFERSON	KY, STATE OF	Y	*
WPCM767	KY	2560 PALUMBO DR	LEXINGTON	FAYETTE	KY, STATE OF	Y	# *
WPCY846	MI	2350 BROWN RD.	PONTIAC	OAKLAND	MI, DETROIT	Y	*
WPCY846	MI	UNIVERSITY TOWERS, 536 S. FOREST AVE.	ANN ARBOR	WASHTENAW	MI, DETROIT	Y	*
WPCQ279	MI	23400 MICHIGAN AVE	DEARBORN	WAYNE	MI, DETROIT	Y	# *
WPCN337	MI	45 CADILLAC SQUARE	DETROIT	WAYNE	MI, DETROIT	Y	# *
WPCM758	MI	28555 EVERGREEN	SOUTHFIELD	OAKLAND	MI, DETROIT	Y	# *
WNZZ809	MI	13000 PRAIRIE	DETROIT	WAYNE	MI, DETROIT	Y	*
WPCY846	MI	328 S SAGINAW ST.	FLINT	GENESEE	MI, FLINT	Y	*
WPBJ817	MI	1308 PLYMOUTH RD NE	BYRON CENTER	KENT	MI, GRAND RAPIDS	Y	# *
WPCM758	MI	910 RIVER ST	LANSING	INGHAM	MI, LANSING	Y	# *
WPCN337	MI	2020 VIDEO LANE	JACKSON	JACKSON	MI, STATE OF	Y	# *
WPCM758	MI	MORGAN & WALBASCON	BATTLE CREEK	CALHOUN	MI, STATE OF	Y	# *
WPCM758	MI	5088 W MICHIGAN	KALAMAZOO	KALAMAZOO	MI, STATE OF	Y	# *
WPBJ817	MI	1650 TREANOR RD	SAGINAW	SAGINAW	MI, STATE OF	Y	# *
WPCT692	MN	DISPATCH, 7450 OXFORD STREET	ST. LOUIS PARK	HENNEPIN	MN, MINNEAPLS-ST PAUL		*